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Attorney for Defendant
VALERIAN CHIOCHIU

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	}	Case No. 2:17-CR-306-JCM-VCF
Plaintiff,		STIPULATION AND
vs.		ORDER CONTINUING SENTENCING
VALERIAN CHIOCHIU (#12)		Current Date: March 19, 2021 at 11:00 a.m.
Defendants.	}	

Defendant Valerian Chiochiu by and through his counsel of record, Alan Eisner and Plaintiff United States of America, by and through its counsel of record, Chad W. McHenry, Trial Attorney, Organized Crime and Gang Section, U.S. Department of Justice, hereby stipulate as follows:

1) Defendant pled guilty pursuant to plea agreement on July 31, 2020, and sentencing and disposition was set for December 11, 2020. (Dkt 730.)

2) The court again continued sentencing on October 23, 2020 to the present date of March 19, 2021. (Dkt. 756).

3) On October 29, 2020 the probation department disclosed its Presentence Investigation Report, which was revised and disclosed to the parties on February 12, 2021.

4) Defense counsel requires additional time to review the presentence investigation report, to adequately prepare defendant's sentencing position and to adequately prepare for the sentencing hearing.

1 5) The government, anticipating the calling of two witnesses to the hearing,
2 was prepared to proceed. However, after conferring with its witnesses and confirming
3 their future availability, the government has no objections to the continuance within the
4 time period proposed below.

5 6) Based on the forgoing, the parties respectfully request the Court to
6 continue the sentencing in this matter to a date and time at the convenience of the Court,
7 but in order to accommodate the government's witnesses, no later than September, 2021,
8 and not during the week of April 5-9, 2021.

9 IT IS SO STIPULATED.

10 Respectfully submitted,

11 EISNER GORIN LLP

12
13 Dated: March 9, 2021

s/Alan Eisner

14 ALAN EISNER
15 Attorney for Defendant
16 VALERIAN CHIOCHIU

17 Respectfully submitted,

18 UNITED STATES OF AMERICA

19
20 Dated: March 9, 2021

s/ Chad McHenry

21 CHAD McHENRY, U.S DEPT OF JUSTICE
22 Trial Attorney
23 Attorney for Plaintiff
24 UNITED STATES OF AMERICA
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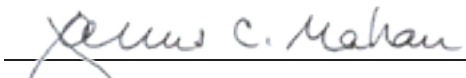
ORDER

Based upon the representation of counsel and for good cause shown, the Court finds that good cause exists, taking into account the public interest in the prompt disposition of criminal cases.

Therefore, IT IS HEREBY ORDERED that:

The sentencing date is continued to June 18, 2021 at 10:00 A.M.

Dated: March 15, 2021.



HON. James C. Mahan
United States District Judge